

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA and UNITED STATES ENVIRONMENTAL PROTECTION AGENCY,)	
)	
)	
Plaintiffs,)	
)	
v.)	
)	
STATE OF VERMONT; PHILIP SCOTT, in his official capacity as Governor of Vermont;)	Civil Action No. 2:25-cv-463
JULIE MOORE, in her official capacity as the Secretary of the Vermont Agency of Natural Resources; and JANE LAZORCHAK, in her official capacity as the Director of the Vermont Agency of Natural Resources Climate Action Office,)	
)	
Defendants.)	

**STIPULATED MOTION TO SUSPEND DEFENDANTS’
DEADLINE FOR RESPONDING TO THE COMPLAINT**

Defendants (collectively, “Vermont”) move to temporarily suspend their deadline for responding to Plaintiffs’ Complaint to provide additional time for the parties to confer about a briefing schedule, with a goal of creating efficiencies by coordinating briefing in this case and the related case *Chamber of Commerce v. Moore*, No. 2:24-cv-01513-MKL (D. Vt.). Vermont has conferred with counsel for Plaintiffs, who consent to the relief requested in this motion.

In support of this motion, Vermont states as follows:

1. In *Chamber of Commerce*, the Court granted the parties’ stipulated motion to suspend Vermont’s deadline for responding to the complaint and further briefing until after (1) this case was served on Vermont and (2) the Court rules on the pending Motion to Intervene [ECF Doc. No. 19] in that case. *See Order, Chamber of Commerce v. Moore*, No. 2:24-cv-1513 (May 23, 2025) [ECF Doc. No. 36].

2. Plaintiffs filed this case on May 1, 2025. They completed service on May 19, 2025. Therefore, Vermont's current deadline for responding to the Complaint is June 9, 2025.

3. This case and *Chamber of Commerce* involve challenges to the same statute and have been designated as related cases.

4. The parties to this case have agreed to confer on a briefing schedule for dispositive motions. Vermont anticipates including the *Chamber of Commerce* parties in these discussions.

5. Accordingly, Vermont respectfully requests that the Court:

- a. Suspend the State's deadline for responding to the Complaint and the parties' Local Rule 26(a)(2) proposed discovery schedule until further order of the Court setting a briefing schedule.
- b. Require the parties to meet and confer on a briefing schedule for this case, and to submit a stipulated schedule or competing proposed schedules by June 23, 2025.

Dated: June 6, 2025

Respectfully submitted,

STATE OF VERMONT

CHARITY R. CLARK
ATTORNEY GENERAL

By: /s/ Jonathan T. Rose
Jonathan T. Rose
Solicitor General
Laura B. Murphy
Hannah W. Yindra
Assistant Attorneys General
Office of the Attorney General
109 State Street
Montpelier, VT 05609
(802) 828-3171
jonathan.rose@vermont.gov
laura.murphy@vermont.gov
hannah.yindra@vermont.gov